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**From:** Mia, Marcia [Mia.Marcia@epa.gov]  
**Sent:** 2/15/2017 1:31:42 PM  
**To:** Krallman, John [krallman.john@epa.gov]; Branning, Amy [Branning.Amy@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Ostrand, Laurie [Ostrand.Laurie@epa.gov]; North, Alexis [North.Alexis@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]  
**Subject:** RE: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC (Streamlining compliance with more stringent requirements)

# Ex. 5 AC/DP

Marcia B Mia  
Office of Compliance/Air Branch  
2227A WJCS  
U.S. Environmental Protection Agency  
202-564-7042

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**From:** Krallman, John  
**Sent:** Wednesday, February 15, 2017 8:27 AM  
**To:** Mia, Marcia <Mia.Marcia@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>  
**Subject:** Re: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC (Streamlining compliance with more stringent requirements)

# Ex. 5 AC/DP

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**From:** Mia, Marcia  
**Sent:** Wednesday, February 15, 2017 8:19:50 AM  
**To:** Krallman, John; Branning, Amy; Marsh, Karen; Ostrand, Laurie; North, Alexis; Fried, Gregory  
**Subject:** RE: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC (Streamlining compliance with more stringent requirements)

## Ex. 5 AC/DP

Thanks for both your comments and Amy's comments.

Laurie, do you have what you need to get back to the state?

Marcia B Mia  
Office of Compliance/Air Branch  
2227A WJCS  
U.S. Environmental Protection Agency  
202-564-7042

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**From:** Krallman, John

**Sent:** Tuesday, February 14, 2017 3:29 PM

**To:** Branning, Amy <Branning.Amy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>

**Subject:** RE: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC (Streamlining compliance with more stringent requirements)

I've added a bit more below in red.

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**From:** Branning, Amy

**Sent:** Tuesday, February 14, 2017 2:54 PM

**To:** Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>

**Cc:** Krallman, John <krallman.john@epa.gov>

**Subject:** RE: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC (Streamlining compliance with more stringent requirements)

Hi Marcia:

# Ex. 5 AC/DP

Amy Huang Branning

EPA Office of General Counsel

phone: (202) 564-1744

fax: (202) 564-5603 or (202) 564-0070

This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. If you believe you have received this e-mail in error, please notify me and delete the e-mail immediately.

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**From:** Mia, Marcia

**Sent:** Monday, February 06, 2017 3:36 PM

**To:** Marsh, Karen <Marsh.Karen@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>

**Subject:** RE: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC (Streamlining compliance with more stringent requirements)

I wanted to circle back around to this and summarize what our think our next steps are.

AMY AND GREG – let me know if I didn't construe this per our discussions.

# Ex. 5 AC/DP

# Ex. 5 AC/DP

Thoughts?

Marcia B Mia  
Office of Compliance/Air Branch  
2227A WJCS  
U.S. Environmental Protection Agency  
202-564-7042

-----Original Appointment-----

**From:** Mia, Marcia

**Sent:** Wednesday, January 25, 2017 3:00 PM

**To:** Marsh, Karen; Ostrand, Laurie; Branning, Amy; Krallman, John; Castro, Grecia; North, Alexis; Lischinsky, Robert

**Subject:** Voluntary Compliance with NSPS OOOO for equipment leaks of VOC (Streamlining compliance with more stringent requirements)

**When:** Wednesday, January 25, 2017 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** NEW CONF LINE 1 **Ex. 6 Personal Privacy (PP)**

**Importance:** High

The legal and Title V nuances are over my head so I am unable to summarize for R8. Wanted to get the brain trust together to figure out next steps. Thanks.

We had a question come up from Region 8 (state of Colorado specifically) regarding a natural gas processing plant's recent application for an air permit. Specifically, the processing plant has 2 trains, one of which is subject to NSPS KKK and the other is subject to NSPS Quad O. In their application, they are requesting to comply with NSPS Quad O for both trains (for ease of compliance). In general, NSPS Quad O is more stringent for natural gas processing plants because it follows NSPS VVa (which has lower leak definitions) instead of NSPS VV.

We wanted to get your opinion on whether the state can put this requirement in the permit, or if someone at EPA would need to make that approval.